

### REMARKS

Reconsideration of the above-identified application in view of the amendments above and the remarks following is respectfully requested. Claims 1-32 are in this case. Claims 1-22 have been rejected under § 102 and/or § 103. Claims 1-22 have now been canceled. Claims 23-31 have now been added.

The Applicant believes that the claims before the Examiner now correspond to allowable subject matter, as will be detailed below.

The claims before the Examiner are directed toward a system and method for organizing and retrieving content of documents according to paragraph groups, the paragraph groups having one or more paragraphs. The Examiner should note that “searches” are not performed “on the fly”. In accordance with the present invention, each of the paragraph groups is linked to an organized index of concepts before a user initiates an inquiry. When a user wants to find paragraphs associated with a particular concept, the linked paragraphs are simply recalled for viewing by the user. (See “Summary of the Invention” on pages 13 to 16 of the originally filed application).

#### Hierarchical Concept Index

The concepts are organized in a hierarchy. The hierarchy has a top “root” level and a plurality of sub-nodes below the root node. Each sub-node has only one parent node. Each parent nodes has one or more sub-nodes. Each sub-node is associated with a concept which is a narrower sub-concept of a concept associated with a corresponding parent node. Therefore, even users who are unfamiliar with professional terms can navigate up and down the hierarchy to find the appropriate concept. (See Figs. 2, 3 and 8.1 of the originally filed application).

#### Comparing and Linking Process

Each node of the hierarchy is associated with one or more word groups. A word group is a plurality of words in at least one specific combination used to identify a concept within a paragraph group. Each paragraph group is compared with each word group of each node. After the comparing process, matching paragraphs are linked to one or more nodes. (See page 29, line 21 to page 30, line 13 of the originally filed application).

#### Virtual Database of Links

The database of the present system is a virtual one in that it does not contain the content of the paragraphs or the documents. The database of the present invention only includes links that point from the nodes of the hierarchy to the paragraphs. In accordance with the most preferred embodiment of the present invention the database includes four tables:

1. Node table – this table describes the hierarchical structure of the nodes and the associated concept that the node represents;
2. Word Group table – this table contains records of collection of words in specific combinations. Each of the word groups is used to detect the presence of an idea within a given paragraph group. Records in the word group table are therefore linked to nodes in the node table;
3. Paragraph table – this table lists the available paragraph groups and the physical location of the content of the paragraph groups which reside outside of the database; and
4. Node content table – this table links each of the nodes in the node table to one or more of the paragraph groups in the paragraph table. (See page 31, line 14 to page 32 line 16 of the originally filed application).

### Presentation

A user views paragraphs associated with a particular concept in a multiple windows window. That is each paragraph is displayed in a scrollable window. The individual scrollable windows are in turn displayed in a scrollable window. (See page 32, line 19 to page 33, line 9 of the originally filed application as well as Fig. 4).

### Rejections

The Examiner has rejected claims 1-22 as being unpatentable as being anticipated by Biffer, US Patent No. 6,397,212 (henceforth, "Biffer") and/or Kanaegami, US Patent No. 5,297,039 (henceforth, "Kanaegami"). The Examiner's rejections are respectfully traversed.

While continuing to traverse the Examiner's rejections, and without in any way prejudicing the patentability of the rejected claims, the Applicant has, in order to expedite the prosecution, chosen to cancel claims 1-22 and add new claims 23-31.

Biffer teaches a self learning search engine, whereby data regarding previous searches of the same user and other users is used to improve the next search (Column 3, lines 25-35). Biffar does not teach pre-tagging or classification of the database. In fact, Biffar teaches away from pre tagging in column 5 lines 58 to 63 which describe "An Item can be tagged on-the-fly. In case of a knowledge data base, the system reviews tables of content and summaries along certain characteristics and/or key words, and tags the information for the search, during the search (i.e. the information is not pre-tagged).” Therefore, Biffar teaches performing searches in response to user defined search criteria, such as key words. Additionally, Biffar does not teach comparing a paragraph or a group of paragraphs to the search criteria. Also, the Examiner will note that while Biffar teaches searching items (records) (see column 4 lines 27 to column 5 line 35), the present invention teaches matching and linking

paragraphs to concepts. The Examiner will note that whereas one paragraph may deal with more than one concept, one item or record can only have one match. For example, a record of a book can only be classified as a book. However, paragraphs from a text can deal simultaneously with more than one concept in the hierarchy.

Kanaegami teaches extracting analysis networks from texts (Abstract). The texts are, for example, abstracts of technical papers (column 1, lines 8-10). The analysis networks are then stored in a database. The analysis networks consist of lines each including elements and relations extracted from the texts (Abstract of Kanaegami). Therefore, the analysis networks are not whole paragraphs. User searches are then carried out on the analysis networks. Therefore, searches are not performed on whole paragraphs. Additionally, searches are performed “on the fly”.

Both Biffar and Kanaegami do not teach a database having only links to paragraph groups, the content of the paragraph groups residing in an external database. Additionally, Biffar and Kanaegami do not teach the use of a hierarchical concept index nor displaying inquiry results using a multiple windows-window.

### **New Claims**

New claims 23-31 have been added.

New independent claims 23 and 27 recite a method and system, respectively, for organizing and retrieving content of documents according to paragraph groups. The paragraph groups are all compared to each node of the concept index prior to any user inquiry being performed. Matching paragraphs are linked to associated nodes. A user then navigates the concept index to retrieve paragraphs which are linked to a chosen node. Support for these claims is found in the “Summary of the Invention” on pages 13 to 16 of the originally filed application.

New dependent claims 24 and 28 specify that the concept index is a hierarchical concept index. Support for these claims is found in Figs. 2, 3 and 8.1 of the originally filed application).

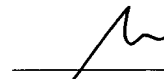
New dependent claims 25 and 29 specify navigating by the user from the root node of the hierarchy to the desired node. Support for these claims is found on page 21 lines 3 to 14 and page 22 lines 6 to page 24 line 6.

New dependent claims 26 and 30 specify that viewing of the retrieved paragraphs is in a multiple windows window. That is each paragraph is displayed in a scrollable window. The individual scrollable windows are in turn displayed in a scrollable window. Support for these claims is found on page 32, line 19 to page 33, line 9 of the originally filed application as well as Fig. 4.

New dependent claim 31 specifies that the database includes only links to each of the paragraph groups and not the complete content of the paragraph groups themselves. Support for this claim is found on page 15, lines 6 to 9 of the originally filed application.

In view of the above amendments and remarks it is respectfully submitted that independent claims 23 and 27, and hence also dependent claims 24-26 and 28-31, are in condition for allowance. Prompt notice of allowance is respectfully and earnestly solicited.

Respectfully submitted,

  
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